

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	
Plaintiffs,	)	C.A. No. 20-613-LPS
	)	
v.	)	
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND ORDER TO EXTEND DEADLINES**

WHEREAS Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (“Plaintiffs”) and Defendant ROSS Intelligence Inc. (“Defendant”) (collectively, the “Parties”) have exchanged document requests and responses and continue to produce documents in the regular course of fact discovery;

WHEREAS the Parties have been working diligently to complete fact discovery and agree that an extension of the schedule is necessary to complete document productions and depositions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiffs and Defendant, subject to the approval of the Court, that the Scheduling Order (D.I. 41) is hereby amended as follows:

Event	Current Deadline	New Deadline
Substantial Completion of Document Productions	December 17, 2021	February 4, 2022
End of fact discovery	January 21, 2022	April 21, 2022
Opening Expert Reports	February 18, 2022	May 19, 2022
Rebuttal Expert Reports	March 16, 2022	June 16, 2022
Reply Expert Reports	April 20, 2022	July 14, 2022

Close of expert discovery	May 20, 2022	August 11, 2022
Opening Summary Judgment Briefs	June 10, 2022	September 8, 2022
Summary Judgment Opposition Briefs	July 11, 2022	October 6, 2022
Summary Judgment Reply Briefs	August 10, 2022	November 3, 2022

IT IS FURTHER STIPULATED AND AGREED that, although fact discovery will close on April 21, 2022, Defendant will endeavor to make Defendant's CEO and Co-Founder Andrew Arruda and its 30(b)(6) witness(es) available for deposition on or before April 1, 2022.

This stipulation does not affect any other case deadlines. In particular, Plaintiffs' motion to dismiss Defendant's antitrust and unfair competition counterclaims (D.I. 27) has been fully briefed and argued but remains pending before the Court. Consistent with the Court's May 3, 2021 Order (D.I. 41, at 4), all aspects of the case schedule will be subject to reevaluation after the Court resolves Plaintiffs' pending motion to dismiss.

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November 10, 2021

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**IT IS SO ORDERED** this \_\_\_\_ day of November, 2021.

\_\_\_\_\_  
United States District Judge